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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	Case No.: 2:15-cr-00345-JAD-VCF
Plaintiff,)	
)	STIPULATION FOR
vs.)	PROTECTIVE ORDER
)	
CARLOS VERA,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States, and Heidi Ojeda, Assistant Federal Public Defender, counsel for defendant CARLOS VERA, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying information such as social security numbers, drivers' license numbers, dates of birth, or addresses, of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

1. Protected Documents which will be used by the government in its case in chief include personal identifiers, including for example, social security numbers, drivers' license numbers, dates of birth, and addresses, of participants, witnesses, and victims in this case.

1 2. Discovery in this case is estimated to be a few hundred pages in length. Given
2 the nature of the allegations and the facts and circumstances surrounding the crimes with which
3 the defendant is charged, that is, that the defendant assumed identities of persons other than
4 himself, and obtained identity documents bearing the defendant's photograph in the victims'
5 names and personal identifiers, many of the documents in the discovery necessarily include
6 personal identifiers. Redacting the personal identifiers of participants, witnesses, and victims
7 would prevent the timely disclosure of discovery to defendant.

8 3. The United States agrees to provide Protected Documents without redacting the
9 personal identifiers of participants, witnesses, and victims.

10 4. Access to Protected Documents will be restricted to persons authorized by the
11 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,
12 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

13 5. The following restrictions will be placed on defendant, defendant's attorney(s)
14 and the above-designated individuals unless and until further ordered by the Court. Defendant,
15 defendant's attorneys and the above-designated individuals shall not:

16 a. make copies for, or allow copies of any kind to be made by any other
17 person of Protected Documents;

18 b. allow any other person to read Protected Documents; and

19 c. use Protected Documents for any other purpose other than preparing to
20 defend against the charges in the Indictment or any further superseding indictment arising out of
21 this case.

22 6. Defendant's attorney(s) shall inform any person to whom disclosure may be
23 made pursuant to this order of the existence and terms of this Court's order.

8. Upon conclusion of this action, defendant's attorney(s) shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying information such as social security numbers, drivers' license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after the last appeal is final.

/s/Kimberly M. Frayn
KIMBERLY M. FRAYN
Assistant United States Attorney

/s/Heidi Ojeda
HEIDI OJEDA
Assistant Federal Public Defender
Counsel for defendant CARLOS VERA

March 8, 2016
DATE

IT IS SO ORDERED this 8th day of March, 2016.

Car. Fackel